



Eric Gonzalez
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[INSERT NAME]
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: **NAGWA HANNA**

MOS TAX: [REDACTED]

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

Disclosure # 1:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATIONS, DATED 05/16/2008, AGAINST MOS HANNA:

ALLEGATION 1: PARKING PERMIT RESTRICTED FORGED

ALLEGATION 2: PARKING CONDITION

CASE STATUS: CLOSED ON 07/29/2009

Disclosure # 2:

THE NYPD NOTED THE FOLLOWING NON-CONFORMANCE BY MOS HANNA:

REGARDING 2010-122505 (R673999)/ 2012-022469 (1000135789)/ 2012-095967 (4000078340)/ 2013-077072 (4000157309, 4000157316)/ 2013-101064 (2000254090)/ 2014-016979 (3000333911), Marihuana was identified without vegetative matter being listed as a descriptor on the report. The evidence consisted of vegetative matter; however, the description on the report was incorrect.

Disclosure # 3:

THE NYPD NOTED THE FOLLOWING NON-CONFORMANCE BY MOS HANNA:

The analyst obtained results that were inconsistent with the expected results. The analyst was issued a subsequent proficiency test (QUANT 16-001) that was successfully completed.

Disclosure # 4:

THE NYPD NOTED THE FOLLOWING NON-CONFORMANCE BY MOS HANNA:

REGARDING 2019-026334 (4000658313)/ 2019-028387 (1001206701), The analyst stored the evidence in a drawer at her work area, instead of in a lock box, as required by procedure. The evidence had been previously analyzed and was in its final packaging and in a signed and sealed condition.

Disclosure # 5:

THE NYPD NOTED THE FOLLOWING NON-CONFORMANCE BY MOS HANNA:

REGARDING 09-CSAS-108888 (R009389)/ 09-CSAS-071009 (P773204)/ 07-CSAS-115520 (N884830), The analyst conducted inadequate technical reviews of some cases.

Disclosure # 6:

THE NYPD NOTED THE FOLLOWING NON-CONFORMANCE BY MOS HANNA:

REGARDING 2011-010236 (R759459)/ 2011-009669 (R764642)/ 2011-004171 (R748666)/ 2011-004667 (R526238)/ 2011-006465 (R689728), The analyst documented the wrong year when entering the laboratory number her instrumental data (referencing 2010, not 2011). The laboratory number was corrected on the instrumental data.

Disclosure # 7:

THE NYPD NOTED THE FOLLOWING NON-CONFORMANCE BY MOS HANNA:

REGARDING 2010-115112 (R660699)/ 2010-125059 (R682075)/ 2011-021070 (R774828), The analyst issued a report that was missing a unit of measurement for a weight. The report was amended.

Disclosure # 8:

THE NYPD NOTED THE FOLLOWING NON-CONFORMANCE BY MOS HANNA:

REGARDING 2012-097463 (2000129610, 6000003171), An empty bag from this case was found on the floor in the laboratory.

Disclosure # 9:

THE NYPD NOTED THE FOLLOWING NON-CONFORMANCE BY MOS HANNA:

REGARDING 2013-124392 (2000275331)/ 2013-124403 (2000275231), Prior to delivery at the laboratory, the invoices for two cases were inadvertently switched. When receiving the case, the analyst did not notice that some of the unique identifiers of the packaging did not match those listed on the voucher and proceeded to analyze the case, noting a discrepancy, but not realizing that the evidence did not belong to that voucher.

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